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### REMARKS

Claims 158-199 are pending herein. Claim 158 has been amended to better define the discontinuous nature of the adhesive used to bond the layers – which is now recited as including bridges of adhesive between parallel yarns. Support for this amendment comes from the specification as filed, e.g., at paragraph nos. [0009 to 0012] of the specification as filed. No new matter has been added by virtue of this amendment.

Claims 158, 169, 178, 179, and 193 are rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claim 59 of copending Application No. 10/088,576, now allowed claim 35 in US Patent No. 6,805,771.

In view of this rejection, Applicant submits herewith a Terminal Disclaimer over U.S. Patent No. 6,805,771. The patent erroneously lists the assignee as Hunter Douglas Industries, B.V. while the assignment as recorded in the USPTO properly states that the patent is owned in the US and Canada by Hunter Douglas Inc., the record owner of the present application.

Claims 158 -190 are provisionally rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 9 -16 of copending Application No. 10/088,613.

Applicant submits that this second Terminal Disclaimer request is improper. In Application Ser. No. 10/088,613, the claims are limited to a non-woven fabric that "consists essentially of" warp-direction yarns and an adhesive. By comparison, the claims of this application cover a non-woven fabric "comprising" warp-direction yarns, weft-direction yarns and an adhesive. Although the fabric of Application Ser. No. 10/088,613

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is used in the process of the present application to manufacture the fabrics claimed herein, the claims of the two applications do not overlap. Nor would anything in the prior art have led one to make the fabric claimed in this application from the fabric of our related application.

Clearly, these inventions are quite distinct, and should not be the subject of a terminal disclaimer rejection. Reconsideration and withdrawal of the same is respectfully requested.

Claims 158 -160, 164, 169, 170, 178 -180, 186, and 193 -199 are rejected under 35 U.S.C. §102(b) as being anticipated by Bascom (3,582,443). This rejection is respectfully traversed.

Bascom discloses a process of making non-woven fabrics by applying adhesive essentially only between warp-direction fibers WS and weft-direction fibers CS. See column 7, lines 32-35 and column 9, lines 57-61. The processes described by Bascom requires highly controlled application of adhesive to selected individual warp strands and/or selected individual cross strands, with other of the warp and cross strands remaining free of adhesive. See Claim 1.

Clearly, this patent neither teaches nor suggests the bridges of adhesive between parallel yarns as recited in the present claims. Accordingly, the Section 102(b) rejection of Claims 158 -160, 164, 169, 170, 178 -180, 186, and 193 -199, cannot stand, and should be withdrawn. Such action is respectfully requested.

Claims 158 -160, 164, 165, 169, 170, 172, 172, 173, 178 -180, 186, 193, 197, and 198 are rejected under 35 U.S.C. §102(b) as being anticipated by Harwood (2,900,980). This rejection is respectfully traversed.

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Harwood discloses a process of making a non-woven fabric by: i) passing warp-direction threads 7 over an adhesive coating roll 12 that coats discontinuously the length of the warp-direction threads 7 but seemingly coats the entire circumference of coated portions of the warp-direction threads 7; and ii) then applying weft-direction threads 8 to the adhesive coating 10 on top of the warp-direction threads 7. See Col. 3, lines 54-72.

Clearly, this patent neither teaches nor suggests the bridges of adhesive between parallel yarns as recited in the present claims. Accordingly, the Section 102(b) rejection of Claims 158 -160, 164, 169, 170, 178 -180, 186, and 193 -199, cannot stand, and should be withdrawn. Such action is respectfully requested.

Claims 158 -167, 169 -189, and 192 -199 are rejected under 35 U.S.C. §103(a) as being unpatentable over Hartstein in view of Bodford et al. (5,342,469). This rejection is respectfully traversed.

As to Hartstein, the Examiner has conceded (on page 7 of the Office Action) that this document discloses only the use of a "structurally intact" -- not a discontinuous -- thermoplastic film for adhering warp and weft yarns to each other.

The teaching of Bodford fails to make up the deficiencies of the primary reference. Bodford merely discloses a process of making a laminate (called a "composite") by applying an array 20 of strands of adhesive between a non-woven substrate 12 and a continuous plastic film 14 --- not between warp-direction and weft-direction yarns.

Moreover, while Bodford states that the adhesive is "discontinuous" -- the teachings of the specification define a nearly uniform adhesive structure -- with substantially unbroken linear filaments, having uniform diameter, with only incidental

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overlap, resulting in a layer having substantially uniform thickness. See Col. 3, line 60 to Col. 4, line 20.

Clearly this proposed combination of Hartstein and Bodford fails to suggest or otherwise make obvious the product defined by the present claims, a non-woven fabric with bridges of adhesive between parallel yarns. Accordingly, the Section 103(a) rejection of Claims 158 -167, 169 -189, and 192 -199 should be reconsidered and withdrawn. Such action is respectfully requested.

Claims 168, 190, and 191 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Hartstein in view of Pittman for the reasons of record. This rejection is respectfully traversed.

Hartman has been distinguished above. The addition of the teachings of Pittman does not render the invention defined by these claims obvious, for the following reasons:

Pittman, like Hartman, discloses a nonwoven fabric made by adhering overlying warp yarns to weft yarns with an adhesive. However, Pittman's adhesive is applied to his yarns by "dipping" the yarns or fabric in the adhesive or by "padding or spraying" the adhesive on the yarns or fabric to "coat" the yarns; see column 3, lines 2-12 and column 8, lines 2-15 of Pittman. Thus, the yarns of a fabric joined by adhesive applied under the combined teachings of Hartman and Pittman, would not be adhered by means of adhesive bridges between parallel yarns as recited in the rejected claims.

Clearly, this combination of art does not suggest or otherwise make obvious the invention defined in the rejected claims. Accordingly, the Section 103(a) rejection of Claims 168, 190, and 191, cannot stand, and should be withdrawn. Such action is respectfully requested.

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Claims 161 -163, 165 -168, 171 -174, 176, 177, 181-185, and 187 -192 are rejected under 35 U.S.C. §103(a) as being unpatentable over Bascom. This rejection is respectfully traversed.

As discussed above, Bascom discloses a process of making non-woven fabrics by applying adhesive essentially only between warp-direction fibers WS and weft-direction fibers CS. See column 7, lines 32-35 and column 9, lines 57-61. The processes described by Bascom requires highly controlled application of adhesive to selected individual warp strands and/or selected individual cross strands, with other of the warp and cross strands remaining free of adhesive. See Claim 1.

Clearly, this patent does not suggest or otherwise make obvious the bridges of adhesive between parallel yarns as recited in the present claims. Accordingly, the Section 103(a) rejection of Claims 158 -160, 164, 169, 170, 178 -180, 186, and 193 -199, cannot stand, and should be withdrawn. Such action is respectfully requested.

#### INTERVIEW REQUEST

The undersigned respectfully requests a telephonic interview with the Examiner regarding this response. Attached is Form PTOL-413A – “Applicant Initiated Interview Request Form.”

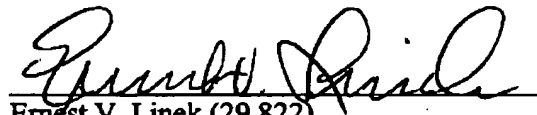
As stated therein, Applicant, through the undersigned, respectfully requests a telephonic interview with Examiner Cole to be held on May 27, 2005 at 2:00 p.m. to discuss the prior art cited in this Rejection, and the arguments submitted herein regarding the same. The undersigned will telephone the Examiner at the stated time.

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**CERTIFICATE OF FACSIMILE TRANSMISSION**

The undersigned hereby certifies that this correspondence was submitted by facsimile in the USPTO on the date shown on Page 1.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ernest V. Linek", is written over a horizontal line.

Ernest V. Linek (29,822)  
Attorney for Applicant

Document No. 114392